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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



472071

May 18, 1992

REPLY TO THE ATTENTION OF:

Ms. Liz Uhl  
WW Engineering & Science  
5555 Glenwood Hills Parkway, SE  
P.O. Box 874  
Grand Rapids, MI 49588-0874

HSRW-6J

Dear Liz,

This letter contains my comments on the technical aspects of the revised Work Plan and Sampling Plan for the Albion-Sheridan Township Landfill site. The following comments should be discussed and/or addressed prior to finalization of the Work Plan:

WORK PLAN

- 1) p. 1-2, Section 1.1 -- In the first full paragraph, change the last sentence to read "...with the concurrence of U.S. EPA after consultation with the Michigan...."
- 2) p. 1-3, last para. -- While the USGS 1981 quad map does show a pond, the aerial photo from 1981 does not. Earlier aerials from 1961, 1967 and 1976 do show the pond. I think I would trust the aerials more. Please change accordingly.
- 3) p. 1-6, first para. -- We may want to add a sentence which acknowledges the presence of the Brooks Foundry production wells and the McGraw-Edison extraction well west of the site, which could have influenced in the past and could presently be influencing the groundwater flow direction in the bedrock aquifer. (See Gene Hall's comment, p. 2, #3)
- 4) p. 2-1, Section 2.1, para. 3 -- At the end of the third sentence, say "...after consultation with the MDNR."
- 5) p. 2-10, Section 2.5.5, para. 3 -- Why are we still evaluating the landfill cover for physical parameters?
- 6) p. 2-11, Section 2.5.6.1 -- Why are subsurface soil samples still being collected at each monitoring location? I guess I'm still not convinced what I will be able to do with the information from the chemical analyses of these samples. We can discuss this.
- 7) p. 2-12, Section 2.5.6.2 -- I am unclear on how the first five wells screened in the glacial deposits fit into this picture. Since it is possible that groundwater flow direction may be different in the two aquifers, I think more importance should be

given to these wells. It was also my impression that a field analysis would be performed on each of these initial shallow wells, but that is not very clear either here or in the SAP.

8) p. 2-13, Section 2.5.6.4 -- Does this section address Bob Delaney's (MDNR) comment?

9) p. 2-15, first full para. -- The reference to Figure 6 should be to Figure 7.

10) p. 2-23, Section 2.10, para. 3 -- Revise the last sentence to read "...in consultation with the MDNR..."

11) p. 3-8 -- Under State Acceptance, delete "and".

12) Figure 6 -- Please move MW-6 out of the resident's yard.

13) General -- Although I realize the start has been delayed slightly from the draft schedule, the overall schedule has been extended. I would like to discuss the reasons for this and how we could be more aggressive with the field work schedule.

#### SAMPLING PLAN

14) p. 2-13, Section 2.4.2.1. para. 1 -- Is it accurate to say that the top of bedrock is expected to be shallow near the river? I thought that we had discussed the possibility of a bedrock valley at one point.

15) p. 2-13, Section 2.4.2.1., para. 3 -- Perhaps a sentence should be added at the end: "Placement of the screen in the glacial aquifer may also depend on the results of the downhole geophysics and vertical sampling."

16) p. 2-19, Section 2.4.4.3, first full para. -- This approach to which wells will be vertically sampled contradicts Figure 5 in the Work Plan. I would rather vertically sample the first downgradient bedrock wells to go in to help define screen depth for the shallow wells.

17) Figure 5 -- This contradicts p. 2-13 of the SAP, which states that the top of screen will be 2 feet below the water table.

Please call me so that we can discuss these comments. Thank you.

Sincerely,

*Mary Beth Novy*  
Mary Beth Novy  
Remedial Project Manager

cc: Pat Vogtman  
Gene Hall  
Mary Pat Tyson